

### REMARKS

Claims 4, 5, 11, and 12 have been canceled without prejudice to further prosecution. Claims 1, 6, 10, 13, and 14 have been amended. No new subject matter has been added. Applicant respectfully requests reconsideration in light of the following remarks. Claims 1-3, 6-10, and 13-25 are pending.

#### Discussion of Claims Rejected under 35 U.S.C. § 102(a)

Claims 1-3, 9, 14-16, 18-22, 24, and 25 are rejected under 35 U.S.C § 102(a) as being anticipated by Soliman *et al.* ("Hierarchical Mobile IPv6 mobility management (HMIPv6)"). Soliman discusses Hierarchical mobility management to reduce the amount of signaling between a mobile node, its Home Agent, and correspondent nodes. See abstract.

Applicant respectfully submits that the cited art does not disclose individually or collectively the combination of elements recited in Claim 1, as amended. For example, the cited art does not disclose a method of operating a network entity at an intermediate node between a mobile node in a foreign network and a correspondent node, the method comprising "tunnelling, in a session between the correspondent node and the mobile node, one or more session packets from the correspondent node to the network entity, wherein the session packets have the correspondent node address as the source address and the care-of address as the destination address," and "forwarding the decapsulated session packets to the mobile node."

In contrast, Applicant respectfully submits that Soliman page 25, last paragraph teaches that "The MAP MUST be able to accept packets tunnelled from the mobile node, with the mobile node being the tunnel entry point and the MAP being the tunnel exit point." In other words, Soliman *et al.* discloses a tunnel which extends from the mobile node (entry point) to the network entity (exit point). Therefore, Soliman does not teach that decapsulated session packets are forwarded to the mobile node. In addition, Applicant respectfully submits that Soliman *et al.* does not disclose any other tunnels. In contrast, Claim 1 requires the existence of a tunnel between the correspondent node and the network entity. The packets traversing such a tunnel are downlink packets.

Accordingly, at least for these reasons, Applicant respectfully submits that Claim 1 overcomes the cited art and is, therefore, in condition for allowance. In addition, Applicant respectfully submits that Claim 14 is also in condition for allowance at least because of reasons

similar to those discussed above with regard to Claim 1. In addition, Applicant does not necessarily agree with the characterization and assessments of the art with respect to the dependent claims, and respectfully submits that the dependent claims are in condition for allowance at least because of the features they include from the independent claims from which they depend and because of their own features.

Discussion of Claims Rejected under 35 U.S.C. § 103(a)

Claims 4-8, 10-13, 17, and 23 are rejected under 35 U.S.C § 102(a) as being unpatentable over Soliman in view of one or more of Aura (U.S. Patent Pub. No. 2005/0041634) and Jung (U.S. Patent Pub. No. 2002/0015396).

Claims 4-8 depend from Claim 1 and Claim 17 depends from Claim 14. Therefore, Applicant respectfully submits that because the additional art does not show at least the features discussed above, Claims 4-8 and 17 are also in condition for allowance at least because of the features they include from Claims 1 and 14 and because of their own features.

Applicant respectfully submits that the cited art does not disclose individually or collectively the combination of elements recited in Claim 10, as amended. For example, the cited art does not disclose at least those features discussed above with regard to Claim 1 and Soliman. Accordingly, at least for these reasons, Applicant respectfully submits that Claim 10 overcomes the cited art and is, therefore, in condition for allowance. In addition, Applicant does not necessarily agree with the characterization and assessments of the art with respect to the dependent claims, and respectfully submits that the dependent claims are in condition for allowance at least because of the features they include from the independent claims from which they depend and because of their own features.

No Disclaimers or Disavowals

Applicant has endeavored to address all of the Examiner's concerns as expressed in the outstanding Office Action. In light of the above amendments and remarks, reconsideration and withdrawal of the outstanding rejections is respectfully requested. If the Examiner has any questions which may be answered by telephone, he is invited to call the undersigned directly.

Although the present communication may include alterations to the application or claims, or characterizations of claim scope or referenced art, Applicant is not conceding in this

**Appl. No.** : 10/588,741  
**Filed** : October 30, 2007

**Docket No.** RJENK41.007APC  
**Customer No.** 20,995

application that previously pending claims are not patentable over the cited references. Rather, any alterations or characterizations are being made to facilitate expeditious prosecution of this application. Applicant reserves the right to pursue at a later date any previously pending or other broader or narrower claims that capture any subject matter supported by the present disclosure, including subject matter found to be specifically disclaimed herein or by any prior prosecution. Accordingly, reviewers of this or any parent, child or related prosecution history shall not reasonably infer that Applicant has made any disclaimers or disavowals of any subject matter supported by the present application.

Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: \_\_\_\_\_

12/27/10

By: \_\_\_\_\_

John M. Carson  
Registration No. 34,303  
Attorney of Record  
Customer No. 20,995  
(619) 235-8550

9162481  
060710